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*Attorneys for Defendants John Shahidi, Nelk, Inc.,
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA - SOUTHERN DIVISION

TRENTON SMITH, Individually and
on Behalf of All Others Similarly
Situating,

Plaintiff,

vs.

JOHN SHAHIDI, NELK, INC.,
METACARD, LLC, NELK USA, INC.,
and KYLE FORGEARD

Defendants.

Case No. 8:25-cv-161-FWS-DFM

CLASS ACTION

**DEFENDANTS' NOTICE OF
MOTION AND MOTION TO
EXCLUDE THE OPINIONS OF
JEREMY CLARK**

Courtroom: 10D
Judge: Hon. Fred W. Slaughter
Date: February 12, 2026
Time: 10:00 a.m. (PST)

TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on February 12, 2026, at 10:00 a.m. (PST) or as soon thereafter as the matter may be heard in the courtroom of the Honorable Fred W. Slaughter, United States District Judge, located at Ronald Reagan Federal Building and United States Courthouse, 411 West Fourth Street, Courtroom 10D, Defendants John Shahidi, Nelk, Inc., Metacard, LLC, Nelk USA, Inc., and Kyle Forgeard (collectively, "Defendants") will and hereby do move for an order excluding the opinions of Jeremy Clark. Defendants bring this motion pursuant to Federal Rule of Evidence 702. The grounds for this motion are set forth in the accompanying Memorandum of Points and Authorities in Support of Defendants' Motion to Exclude the Opinions of Jeremy Clark.

This motion is made following the telephonic conference of counsel pursuant to Local Rule 7-3, which took place on December 23, 2025.

Dated: December 26, 2025

Respectfully submitted,

COOLEY LLP

/s/ Brian M. French

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